# Former Kaiser Aluminum Smelter Site Conditions

March 3, 2020

*Confidential - For Settlement Negotiation Purposes Only*

# Request for assistance from Ecology and Spokane Regional Clean Air Agency

**Stated concerns included:**

- The amount and types of contaminants present that are highly toxic to humans and ecosystems.
- Sediment ponds "no longer doing their job".
- Migration of hazardous substances such as PCBs and metals into waterways that are already polluted by these contaminants (listed as impaired under Section 303(d) of the Clean Water Act).
- Building conditions and illegal trespass, including an increase in homeless encampments on the property, which are likely to result in human exposure.
- Threat of fire particularly with no current water service available on the property.
- Failures to meet state and local regulatory requirements.

# EPA's Removal Site Evaluation

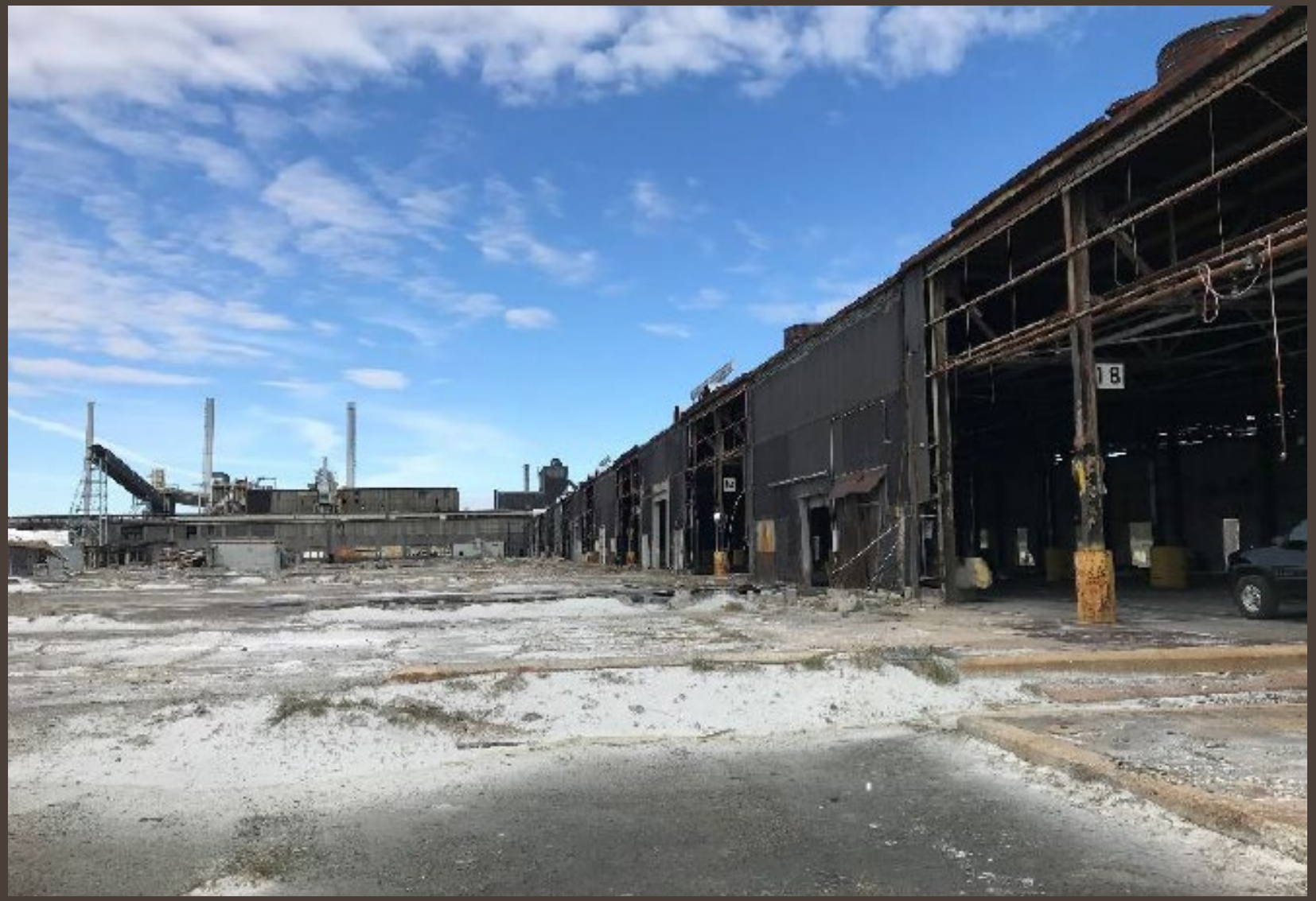
Goals: To assess the presence, concentrations, and migration pathways of hazardous substances at the Former Kaiser Aluminum Smelter Site to determine risks of exposure and potential need for a removal action.

EPA conducted the Removal Site Evaluation in 2019. The final report is dated November 2019.

# The Former Kaiser Aluminum Smelter Site

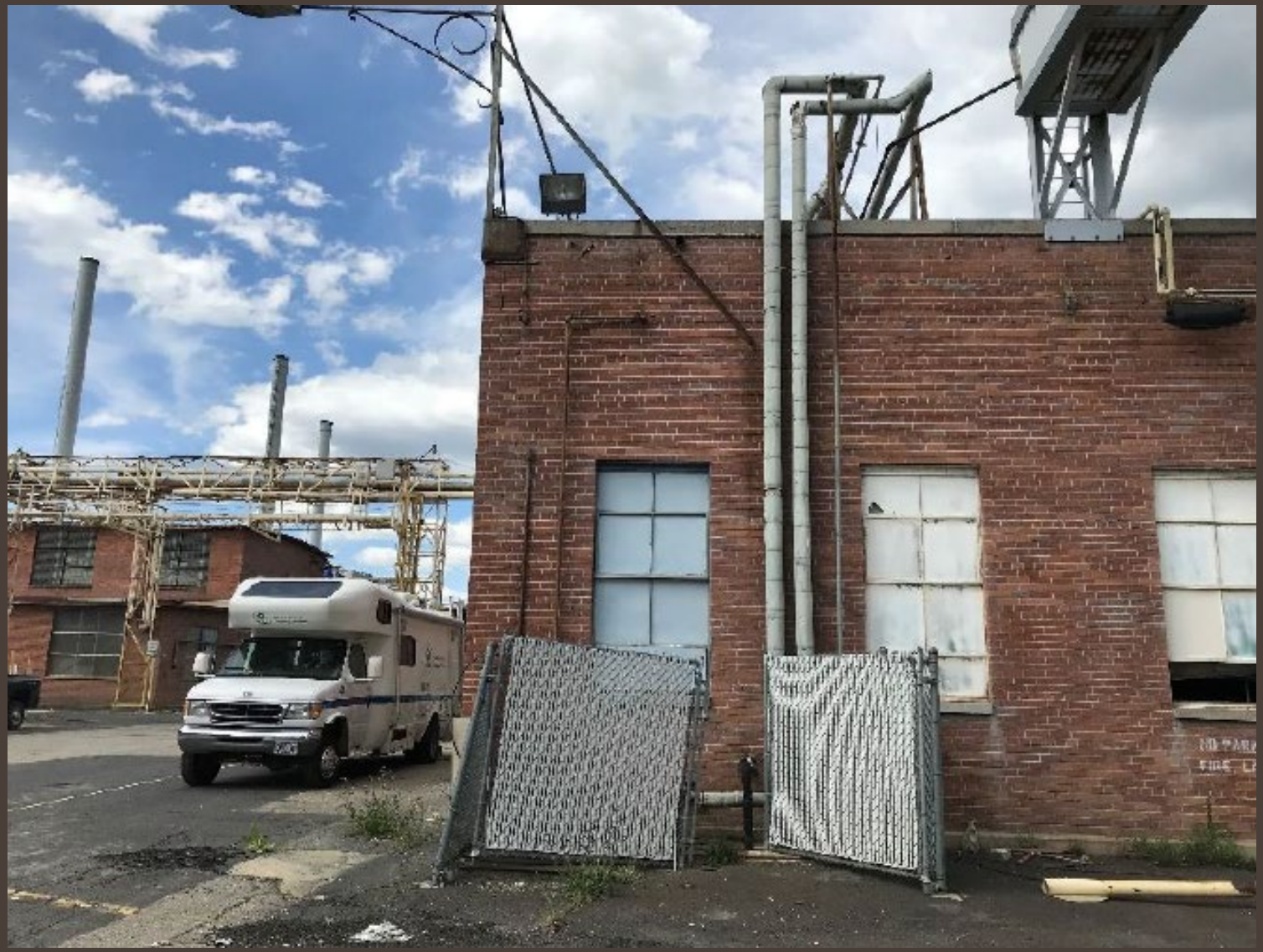
# Findings

- 1. At least 13 buildings have siding material with a coating that is approximately 20% asbestos and has PCB concentrations that are as high as 39,000,000 µg/kg, which is 700 times the limit allowed under the Toxic Substances Control Act (TSCA) and over 400 times EPA's Removal Management Level.



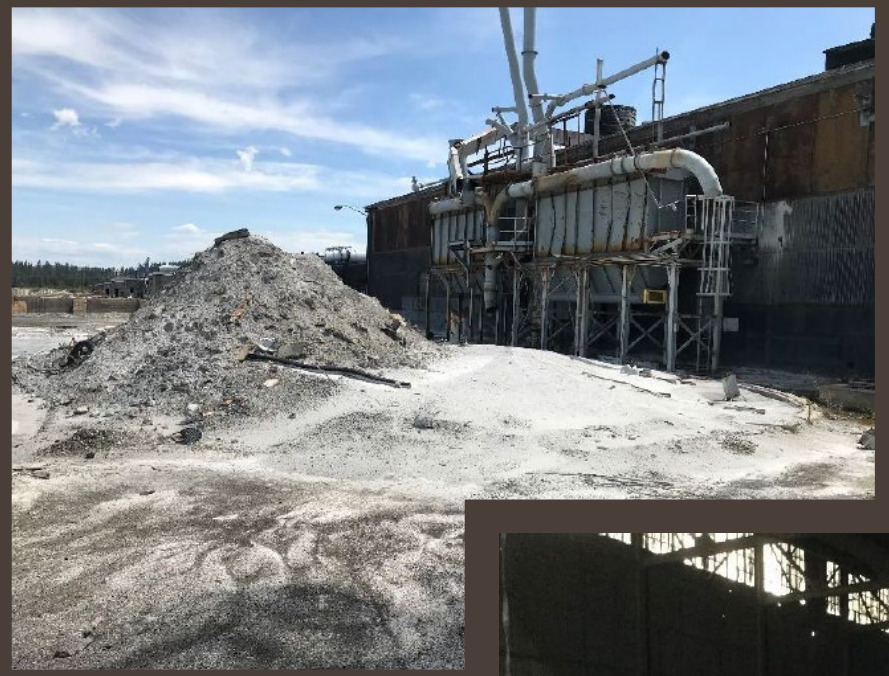
# Findings

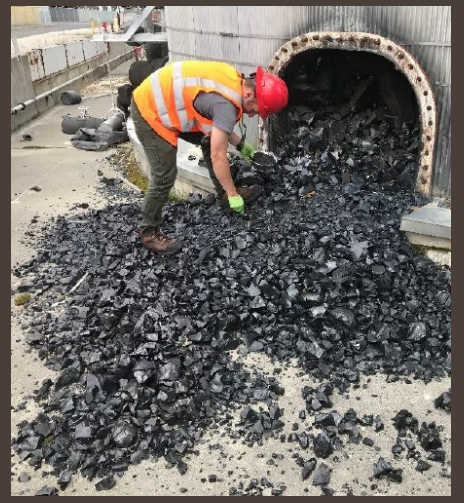
- 2. “TSI” pipe insulation comprised of ~20% asbestos found inside and outside buildings throughout the property is in a deteriorated, friable condition.

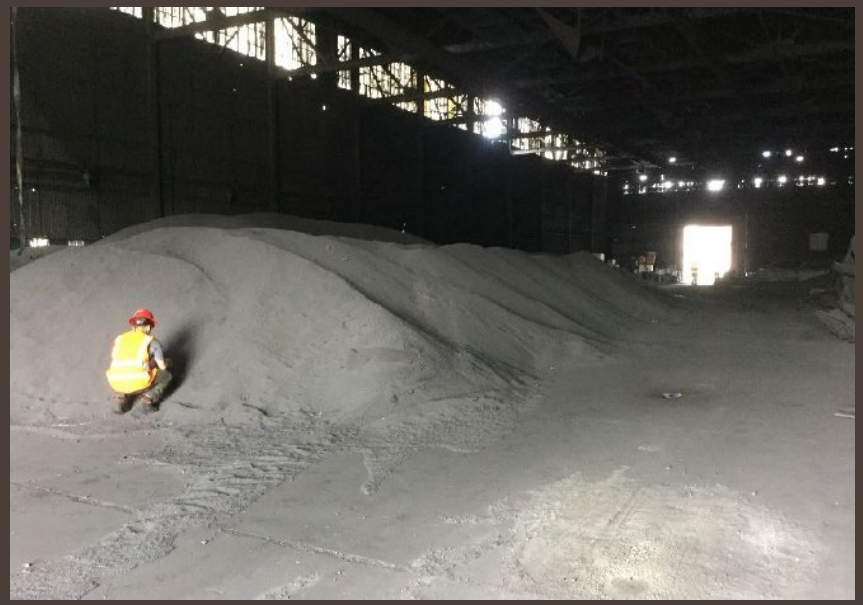


# Findings

3. Waste piles of "green coke", coal tar pitch, and baghouse dust have concentrations of carcinogenic PCBs and PAHs upwards of 17 times the applicable Removal Management Levels.





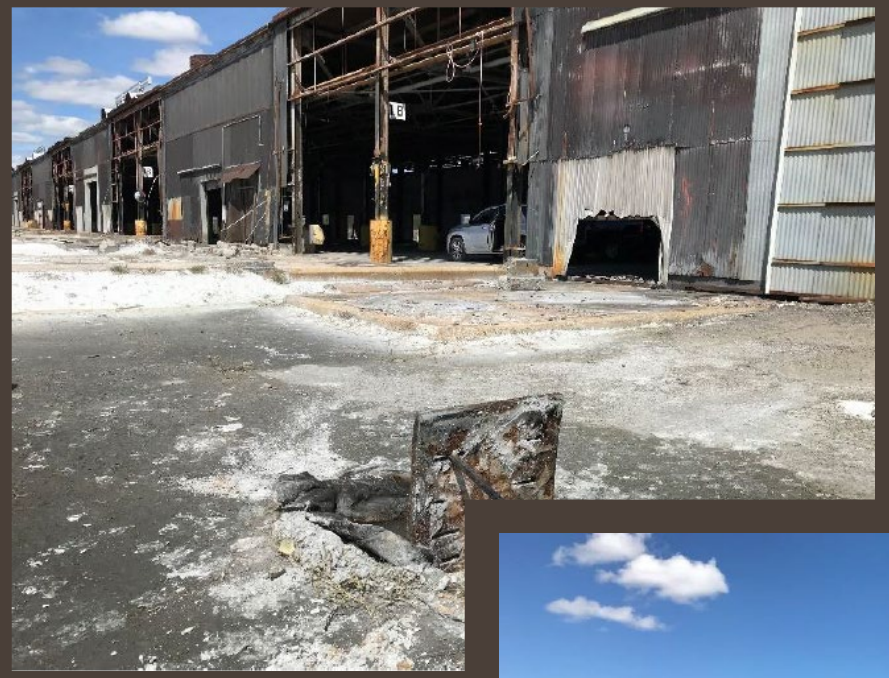


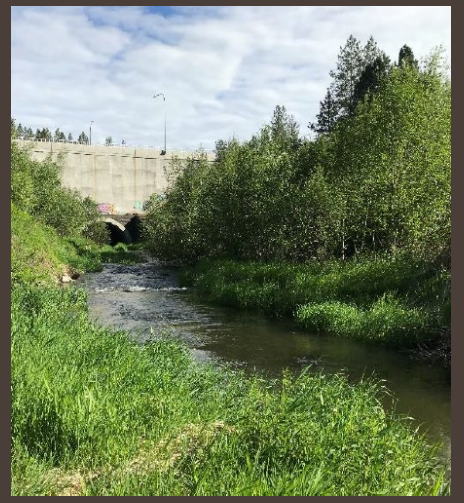
# Findings

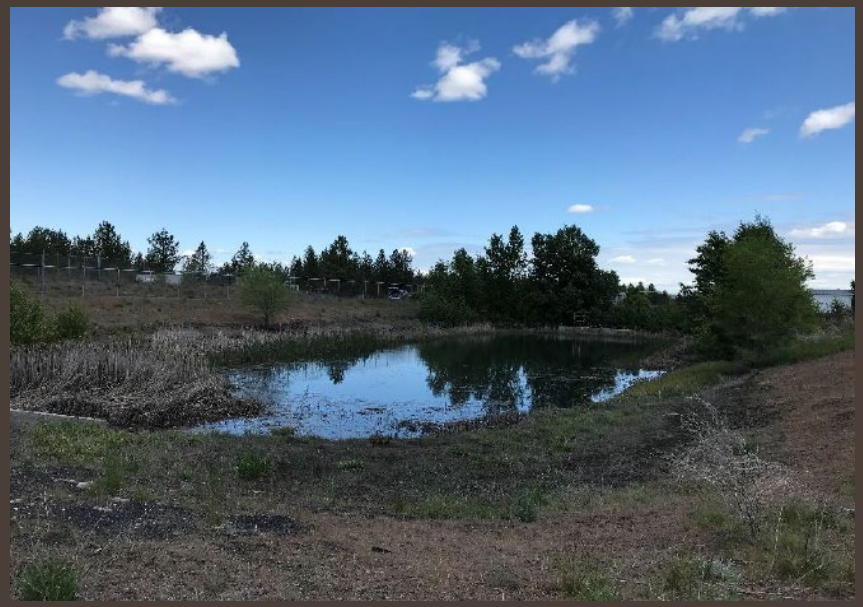
4. According to EPA's Region 10 toxicologist, carcinogenic PCBs, PAHs, and asbestos-containing material create a serious exposure risk to visitors on Site.

PCBs and PAHs are mobilizing from the Site, through a stormwater system and discharging to Deadman Creek.

The settling ponds are full and vulnerable to a catastrophic release of contaminants caused by a severe storm event.

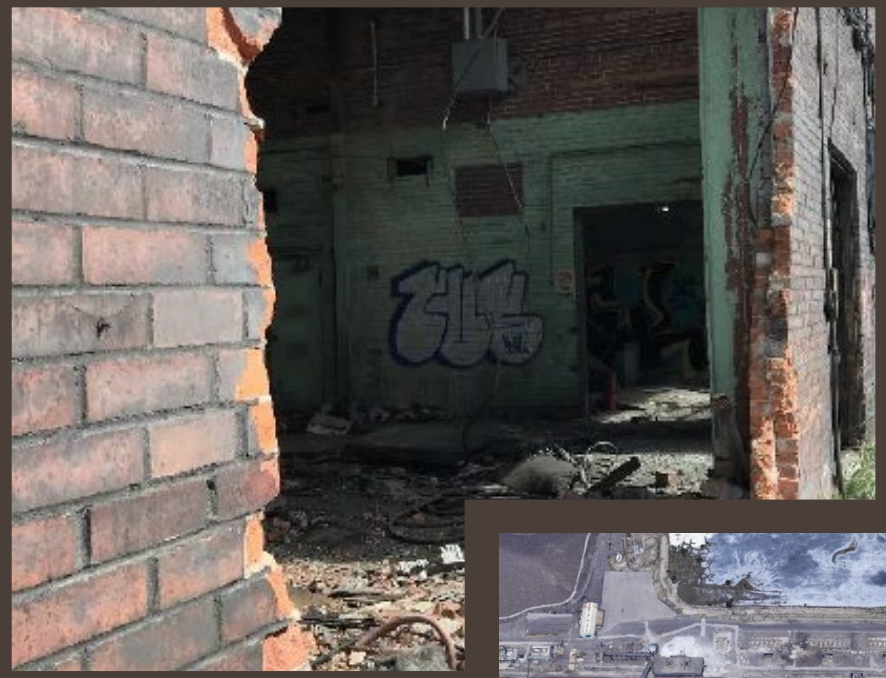






# Findings

5. Authorized businesses and unauthorized visitors are accessing the property without a proper understanding of the health risks.



# Highest priorities for removal actions

- Lower sediment pond containing 1,000 – 1,700 cubic yards of sediment with carcinogenic PCBs and PAHs.
- TSI pipe insulation that is friable.
- Uncontrolled waste piles releasing PCBs and PAHs to soil and stormwater.

# Additional priorities for removal action

- Robertson Siding on buildings containing PCBs and asbestos.
- Upper sediment pond.
- Baghouse dust inside buildings.